

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SwaTN

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: OCT 22 2012

IN RE BEAR STEARNS MORTGAGE
PASS-THROUGH CERTIFICATES LITIGATION

Master File No.:
08 CV 8093 (LTS) (MHD)

This Document Relates To:

All Actions

STIPULATION AND
~~PROPOSED~~ ORDER
REGARDING BRIEFING ON
MOTION FOR LEAVE TO
AMEND AND REQUEST TO
LIFT STAY

X

Plaintiffs New Jersey Carpenters Health Fund, Boilermakers Blacksmith National Pension Trust, Public Employees' Retirement System of Mississippi, Police and Fire Retirement System of the City of Detroit, Iowa Public Employees' Retirement System, the Oregon Public Employee Retirement Fund, City of Fort Lauderdale Police & Fire Retirement System, and San Antonio Fire and Police Pension Fund (collectively, "Plaintiffs") and Defendants Bear, Stearns & Co. Inc. and J.P. Morgan Securities Inc. (now known together as J.P. Morgan Securities LLC), Structured Asset Mortgage Investments II, Inc., Bear Stearns Asset Backed Securities I, LLC, EMC Mortgage Corporation (now known as EMC Mortgage LLC), Joseph T. Jurkowski, Jr., Jeffrey L. Verschleiser, Michael B. Nierenberg, Jeffrey Mayer, Thomas F. Marano, and Samuel L. Molinaro, Jr. (collectively, the "Defendants") state as follows:

WHEREAS, on October 5, 2012, Plaintiffs filed a Motion for Leave to Amend the Third Amended Complaint and Request to Lift the Stay of Proceedings (the "Motion");

WHEREAS, Defendants' opposition to the Motion is currently due on October 19, 2012;

WHEREAS, Plaintiffs' reply in further support of the Motion is currently due on October 26, 2012; and

WHEREAS, the parties have met and conferred concerning an extension of time to file the opposition and reply to the Motion.

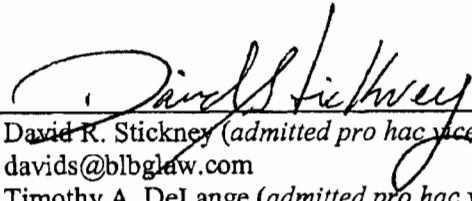
IT IS HEREBY STIPULATED AND AGREED, by and between the Plaintiffs and

Defendants, through their undersigned counsel and subject to the Court's approval, as follows:

1. Defendants' time to file opposition papers is extended to October 31, 2012.
2. Plaintiffs' time to file reply papers is extended to November 16, 2012.

Dated: October 12, 2012

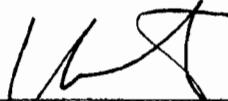
**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

By: 

David R. Stickney (*admitted pro hac vice*)
davids@blbglaw.com
Timothy A. DeLange (*admitted pro hac vice*)
timothyd@blbglaw.com
Matthew P. Jubenville (*admitted pro hac vice*)
matthewj@blbglaw.com
Jonathan D. Uslaner
jonathanu@blbglaw.com
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel: (858) 793-0970
Fax: (858) 793-0323

*Attorneys for Plaintiffs and the Proposed
Class*

BINGHAM MCCUTCHEN LLP

By: 

Kenneth V. Schacter
kenneth.schacter@bingham.com
Laila Abou-Rahme
laila.abou-rahme@bingham.com
Theo J. Robins
theo.robins@bingham.com
399 Park Avenue
New York, NY 10022-4689
Tel: (212) 705-7000
Fax: (212) 752-5378

*Attorneys for Defendants Bear, Stearns
& Co. Inc., J.P. Morgan Securities Inc.,
EMC Mortgage Corporation, Structured
Asset Mortgage Investments II, Inc.,
Bear Stearns Asset Backed Securities I,
LLC and Joseph T. Jurkowski, Jr.*

COHEN, MILSTEIN, SELLERS & TOLL,
P.L.L.C.

By:

Richard Speirs
Christopher Lometti *by OAS*
clometti@cohenmilstein.com
Richard Speirs
rspeirs@cohenmilstein.com
Daniel Rehns
drehns@cohenmilstein.com
Kenneth M. Rehns
krehns@cohenmilstein.com
150 East 52nd Street, Thirtieth Floor
New York, New York 10022
Tel: (212) 838-7797
Fax: (212) 838-7745

Steven J. Toll (*admitted pro hac vice*)

stoll@cohenmilstein.com

Daniel S. Sommers (*admitted pro hac vice*)

dsommers@cohenmilstein.com

Julie Goldsmith Reiser (*admitted pro hac vice*)

jreiser@cohenmilstein.com

S. Douglas Bunch

dbunch@cohenmilstein.com

1100 New York Avenue, NW, Suite 500 West
Washington, D.C. 20005

Tel: (202) 408-4600

Fax: (202) 408-4699

Attorneys for Plaintiffs and the Proposed Class

MORRISON & FOERSTER LLP

By:

Joel C. Haims by ky
Joel C. Haims
JHaims@mofo.com
Ruti Smithline
RSmithline@mofo.com
1290 Avenue of the Americas
New York, New York 10104
Tel: (212) 468-8000
Fax: (212) 468-7900

*Attorneys for Defendants Thomas F. Marano
and Michael B. Nierenberg*

GREENBERG TRAURIG, LLP

By:

Richard A. Edlin by ky
Richard A. Edlin
edlinr@gtlaw.com
Ronald D. Lefton
rlefton@gtlaw.com
Candace Camarata
camaratac@gtlaw.com
200 Park Avenue
New York, New York 10166
Tel: 212-801-9200
Fax: 212-801-6400

Attorneys for Defendant Jeffrey Mayer

KOHN, SWIFT & GRAF, P.C.

Joseph C. Kohn
jkohn@kohnswift.com
dsheils@kohnswift.com
Denis F. Sheils
One South Broad Street, Suite 2100
Philadelphia, PA 19107
Tel: (215) 238-1700
Fax: (215) 238-1968

*Additional Attorneys for Plaintiff the Police and
Fire Retirement System of the City of Detroit*

ALLEN & OVERY

By: Allie Cheatham by kcs
Pamela Chepiga
pamela.chepiga@allenavery.com
Allie Cheatham
allie.cheatham@allenavery.com
1221 Avenue of the Americas
New York, NY 10020
Tel: (212) 610-6300
Fax: (212) 610-6399

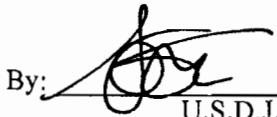
*Attorneys for Defendant Samuel L.
Molinaro, Jr.*

**KRAMER LEVIN NAFTALIS &
FRANKEL LLP**

By: Dani R. James by kcs
Dani R. James
djames@kramerlevin.com
1177 Avenue of the Americas
New York, New York 10036
Tel.: (212) 715-9363
Fax: (212) 715-8000

Attorneys for Jeffrey L. Verschleiser

SO ORDERED:

By:  10/18/12
U.S.D.J.

